Attachment 4

Second Supplemental Report

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March 31, 2025

1. I have been asked to provide an updated analysis of the racial composition of Congressional Districts (CDs) under the Enacted Map and under Demonstration Map 2 from my Expert Report of May 20, 2022. I have been asked to examine the Dallas-Fort Worth and Harris County areas, where my Demonstration Map 2 shows that additional majority Hispanic CDs are possible.

2. I have also been asked to evaluate voting behavior of Hispanic and White voters, and the elections outcomes from the November 2024 elections in the CDs in the Dallas-Fort Worth and Harris County areas under the Enacted Map and under Demonstration Map 2.

3. My qualifications are provided in my Expert Report of May 20, 2022. My compensation is in no way contingent upon my conclusions; I have been given complete autonomy in developing my analysis and conclusions, and all conclusions reached are my own.

4. Election data used in this report come from the Texas Legislative Council. These data are located at https://data.capitol.texas.gov/. Population data come from the American Community Survey (ACS) 5-Year Data 2019-2023. The analyses in my earlier reports relied on the ACS 5-Year Data 2016-2020 and 2017-2021. Those were the most current 5-Year ACS Data available at the time my Expert Report was written. In the meantime, the Census has released the 2019-2023 data. The methods used in this supplemental report are the same as in my Expert Report.

1

5. The boundaries of the districts in my Demonstration Map 2 are identical to those presented in

    my Expert Report, except for Demonstration CD-25 and Demonstration CD-5. Small changes

    in the boundaries of these CDs were made so that the districts conform to the boundaries of

    surrounding CDs under the Enacted Map. Those boundaries differed from the Enacted Map to

    accommodate the configuration of CDs elsewhere in Demonstration Map 2. The boundary

    changes in these CDs have no consequences for the racial composition of these CDs or their

    electoral performance. These changes are minor and in no way change any of the conclusions

    from my Expert Report or my earlier Supplemental Report.

6. The new population data and the results of the 2024 election do not alter substantially my

    conclusions from my Expert Report.

Dallas-Fort Worth

7. There are eight CDs wholly or partly in Dallas and Tarrant Counties under both the Enacted

    Map and Demonstration Map 2. These are CDs 5, 6, 12, 24, 25, 30, 32, and 33.

    Racial Composition

8. The citizen voting age population (CVAP) encompassed by the Dallas-Fort Worth CDs is 52.2

    percent White, 22 percent Hispanic, 19.9 percent Black, and 4.2 percent Asian. See Table 1, top

    panel.

9. There are three majority-minority CDs in the Enacted Map: CD-30, CD-32, and CD-33. Of these 3 CDs, none are majority of a single racial group.   There are 5 majority-White CDs in the Enacted Map: CD-5, CD-6, CD-12, CD-24, and CD-25. See Table 1, top panel.

10. Under Demonstration Map 2, there are three majority-minority CDs: CD-12, CD-30, and CD-33. Of these, Demonstration CD-12 is a majority Hispanic CVAP district. See Table 2, top panel.

Performance of Hispanic-Preferred Candidates

11. Since filing my Expert Report, first Supplemental Report, and Rebuttal Report in 2022, the State of Texas has conducted elections for US House of Representatives in November 2024 under the Enacted Map. I analyze the 2024 US House election results to assess the voting behavior of groups and the electoral performance of the Enacted CDs. I performed Ecological Inference analyses of the 2024 US House elections to measure the preferences of White, Hispanic, Black, and Asian voters under the Enacted CDs in the Dallas-Fort Worth area. Because different candidates are running in different districts, I do not analyze the 2024 US House elections under the Demonstration Map. These results are shown in Table 3 for each CD in which there was both a Republican and a Democratic candidate running in the general election for US House. Ecological Regression analyses are shown in the Appendix table.

12. Out of the six relevant Enacted CDs in Dallas-Fort Worth, Ecological Inference analyses estimate that a majority of White voters in the Enacted Map chose the Republican candidate for US House of Representatives in 2024 in four: CD-5, CD-6, CD-12, and CD-24.   A majority of

White voters chose the Democratic candidate for US House of Representatives in 2024 in two

Enacted CDs: CD-32 and CD-33. See Table 3 top panel.

13. A majority of Hispanic voters chose Democratic candidates for the US House in 2024 in all six

of the relevant Enacted Districts in Dallas-Fort Worth. See Table 3, top panel.

14. Under the Enacted Map, the candidates preferred by Hispanic voters lost in four of the relevant

Enacted CDs in Dallas-Fort Worth: CD-5, CD-6, CD-12, and CD-24 in 2024. The candidates

preferred by Hispanic voters won in Enacted CD-32 and Enacted CD-33.

15. I also performed Ecological Inference analyses of the 52 statewide elections in the state of Texas

from 2016 to 2024 in Dallas-Fort Worth Area. This analysis adds 2024 election results to the

analyses presented in my Expert Report and first Supplemental Report. EI estimates under the

Enacted Map are presented in Table 4. EI estimates under the Demonstration Map are

presented in Table 5.

16. Ecological Inference analyses estimate that a majority of White voters in the Enacted Map chose

the Republican candidate in statewide elections from 2016 to 2024 in the Dallas-Fort Worth

Area in five Enacted CDs: CD-5, CD-6, CD-12, CD-24, and CD-25. A majority of White voters

chose the Democratic candidate in statewide elections from 2016 to 2024 in three Enacted CDs:

CD-30, CD-32, and CD-33. See Table 4 top panel.

17. A majority of Hispanic voters chose Democratic candidates for statewide offices in all eight of

the Dallas-Fort Worth CDs in the Enacted Map. See Table 4, top panel.

18. Turning to the Demonstration Map, Ecological Inference analyses estimate that a majority of White voters in the Demonstration Map chose the Republican candidate in statewide elections from 2016 to 2024 in the Dallas-Fort Worth Area in six Demonstration CDs: CD-5, CD-6, CD-12, CD-24, CD-25, and CD-33. A majority of White voters chose the Democratic candidate in statewide elections from 2016 to 2024 in Demonstration CD-30 and Demonstration CD-32. See Table 5 top panel.

19. A majority of Hispanic voters chose Democratic candidates for statewide offices in all eight of the Dallas-Fort Worth CDs in the Demonstration Map. See Table 5, top panel.

20. Candidates preferred by Hispanic voters won the majority of votes in 52 of 52 statewide elections in from 2016 to 2024 in three CDs under the Enacted Map: CD-30, CD-32, and CD-33. Candidates not preferred by Hispanic voters won the majority of votes in 52 of 52 statewide elections from 2016 to 2024 under the Enacted Map in five CDs: CD-5, CD-6, CD-12, CD-24, and CD-25. See Table 6.

21. Candidates preferred by Hispanic voters won the majority of votes in 52 of 52 statewide elections in from 2016 to 2024 in three CDs under the Demonstration Map: CD-12, CD-30, and CD-33. Candidates preferred by Hispanic voters won the majority of votes in 49 of 52 statewide elections from 2016 to 2024 in Demonstration CD-32. Candidates not preferred by Hispanic voters won the majority of votes in 52 of 52 statewide elections from 2016 to 2024 under the Demonstration Map in four CDs: CD-5, CD-6, CD-24, and CD-25.   See Table 6.

Harris County

22. There are nine CDs wholly or partly in Harris County under both the Enacted Map and Demonstration Map 2. These are CDs 2, 7, 8, 9, 18, 22, 29, 36, and 38. A tenth CD, CD 14, is just southeast of Harris County.

Racial Composition

23. The CVAP encompassed by the ten Harris County Area CDs is 44.6 percent White, 26.5 percent Hispanic, 20.5 percent Black, and 7.0 percent Asian. See Table 1, bottom panel.

24. There are five majority-minority CDs in the Enacted Map: CD-7, CD-9, CD-18, CD-22, and CD-29. Of these, only Enacted CD-29 is majority of a single racial group, with a 63.4 percent Hispanic CVAP. There are five majority-White CVAP CDs in the Enacted Map: CD-2, CD-8, CD-14, CD-36, and CD-38. See Table 1, bottom panel.

25. Under Demonstration Map 2, there are five majority-minority CDs: CD-7, CD-9, CD-18, CD-29, and CD-38. Of these, two are majority of a single racial group (Hispanic). Demonstration CD-29 is 51.5 percent Hispanic CVAP, and Demonstration CD-38 is 52.7 percent Hispanic CVAP. See Table 2, bottom panel.

Performance of Hispanic-Preferred Candidates

26. Ecological Inference analyses estimate that a majority of White voters in the Enacted Map chose the Republican candidate for US House of Representatives in 2024 in the Harris County Area in

6

six Enacted CDs: CD-2, CD-8, CD-14, CD-22, CD-36, and CD-38. A majority of White voters chose the Democratic candidate for US House of Representatives in 2024 in three Enacted CDs: CD-7, CD-18, and CD-29. There was no Republican candidate in Enacted CD-9. See Table 3 bottom panel.

27. A majority of Hispanic voters chose Democratic candidates for the US House in 2024 in seven Enacted CDs: CD-2, CD-7, CD-8, CD-14, CD-18, CD-29, and CD-36. A majority of Hispanic voters chose Republican candidates for US House in 2024 in two Enacted CDs: CD-22 and CD-38. See Table 3, bottom panel.

28. Under the Enacted Map, the candidates preferred by Hispanic voters lost four CDs: CD-2, CD-8, CD-14, and CD-36. The candidates preferred by Hispanic voters won the 2024 US House election in five CDs: CD-7, CD-18, CD-22, CD-29, and CD-38.

29. Looking at the 52 statewide elections in Texas from 2016 to 2024 in the Harris County Area, Ecological Inference analyses estimate that a majority of White voters in the Enacted Map chose the Republican candidate in seven Enacted CDs: CD-2, CD-8, CD-14, CD-22, CD-29, CD-36, and CD-38.   A majority of White voters chose the Democratic candidate in statewide elections from 2016 to 2024 in three Enacted CDs: CD-7, CD-9, and CD-18. See Table 4 bottom panel.

30. A majority of Hispanic voters chose Democratic candidates for statewide offices in all ten of the Harris County Area CDs in the Enacted Map. See Table 4, bottom panel.

31. Turning to the Demonstration Map, Ecological Inference analyses estimate that a majority of White voters in the Demonstration Map chose the Republican candidate in statewide elections from 2016 to 2024 in the Harris County Area in nine Demonstration CDs: CD-2, CD-8, CD-9, CD-14, CD-18, CD-22, CD-29, CD-36, and CD-38. A majority of White voters chose the Democratic candidate in statewide elections from 2016 to 2024 in Demonstration CD-7. See Table 5 bottom panel.

32. A majority of Hispanic voters chose Democratic candidates for statewide offices in all of the Harris County Area CDs in the Demonstration Map. See Table 5, bottom panel.

33. Candidates preferred by Hispanic voters won the majority of votes in 52 of 52 statewide elections in from 2016 to 2024 in four CDs under the Enacted Map: CD-7, CD-9, CD-18, and CD-29. Candidates not preferred by Hispanic voters won the majority of votes in 52 of 52 statewide elections from 2016 to 2024 under the Enacted Map in six CDs: CD-2, CD-8, CD-14, CD-22, CD-36, and CD-38. See Table 6.

34. Candidates preferred by Hispanic voters won the majority of votes in 52 of 52 statewide elections in from 2016 to 2024 in four CDs under the Demonstration Map: CD-7, CD-9, CD-18, and CD-29. Candidates preferred by Hispanic voters won the majority of votes in 44 of 52 statewide elections in from 2016 to 2024 in Demonstration CD-38. Candidates not preferred by Hispanic voters won the majority of votes in 52 of 52 statewide elections from 2016 to 2024 under the Demonstration Map in five CDs: CD-2, CD-8, CD-14, CD-22, and CD-36. See Table 6.

District	2020 Census Total Population	American Community Survey 2019-2023				
		Total CVAP	White CVAP	Hispanic CVAP	Black CVAP	Asian CVAP
Dallas-Fort Worth Area						
5	766,987	515,869	58.5%	19.2%	16.4%	4.2%
6	766,987	491,982	56.6%	23.0%	16.0%	2.9%
12	766,987	552,432	64.1%	19.0%	12.1%	3.1%
24	766,987	518,180	70.1%	13.1%	8.4%	6.3%
25	766,987	560,727	66.8%	16.7%	12.3%	2.4%
30	766,987	498,919	23.9%	24.5%	47.2%	3.1%
32	766,987	469,255	43.9%	23.0%	24.3%	6.9%
33	766,987	394,024	23.5%	43.6%	26.1%	5.6%
Total	6,135,896	4,001,388	52.2%	22.0%	19.9%	4.3%
Harris County Area						
2	766,987	498,841	58.5%	22.6%	13.7%	3.6%
7	766,987	467,712	36.7%	21.2%	22.3%	18.1%
8	766,987	516,444	56.1%	23.5%	13.5%	5.4%
9	766,987	445,325	17.9%	25.7%	46.0%	9.3%
14	766,987	547,471	59.8%	19.6%	17.0%	2.3%
18	766,987	465,972	23.4%	30.4%	39.5%	5.4%
22	766,987	512,659	48.9%	24.6%	13.6%	11.4%
29	766,987	389,885	13.8%	63.4%	19.0%	3.2%
36	766,987	518,683	59.2%	23.0%	13.1%	3.4%
38	766,987	501,997	58.1%	19.9%	11.7%	8.6%
Total	7,669,870	4,864,988	44.6%	26.5%	20.5%	7.0%

Table 1. Enacted Map: Total and Citizen Voting Age Populations of CDs in Harris County Area

Table 2. Demonstration Map 2: Total and Citizen Voting Age Populations of CDs in Harris County Area						
	2020 Census	American Community Survey 2019-2023				
District	Total Population	Total CVAP	White CVAP	Hispanic CVAP	Black CVAP	Asian CVAP
Dallas-Fort Worth Area						
5	766,987	556,793	65.4%	14.3%	13.8%	4.5%
6	766,987	570,535	69.4%	17.2%	10.0%	1.7%
12	766,987	367,286	24.8%	53.3%	17.6%	3.2%
24	766,987	494,826	60.6%	14.5%	13.4%	9.3%
25	766,987	549,766	71.9%	17.0%	6.5%	2.9%
30	766,987	503,153	24.7%	23.7%	47.8%	2.6%
32	766,987	461,224	50.3%	22.6%	20.0%	5.3%
33	766,987	497,805	37.6%	23.6%	32.4%	4.9%
Total	6,135,896	4,001,388	52.2%	22.0%	19.9%	4.3%
Harris County Area						
2	766,987	503,529	51.3%	22.1%	14.8%	10.3%
7	766,987	467,436	36.8%	21.2%	22.3%	18.1%
8	766,987	517,531	64.8%	18.9%	9.5%	5.3%
9	766,987	462,698	24.0%	22.2%	39.8%	12.8%
14	766,987	538,519	57.5%	18.6%	19.0%	3.5%
18	766,987	485,436	26.0%	27.4%	41.6%	3.5%
22	766,987	521,211	50.4%	26.8%	14.6%	6.9%
29	766,987	400,743	20.1%	51.5%	21.6%	5.8%
36	766,987	543,925	73.9%	14.0%	9.3%	1.1%
38	766,987	423,960	26.8%	52.7%	15.4%	4.1%
Total	7,669,870	4,864,988	44.6%	26.5%	20.5%	7.0%

Table 3. Enacted Map: Ecological Inference (EI) Estimates of Preferences of White, Black and Hispanic Voters in the 2024 US House General Elections

District	White	[min, max]	Black	[min, max]	Hispanic	[min, max]	Polarization B-W	H-W
				Percent Democratic				
				Dallas – Fort Worth Area				
5	9	[7, 11]	87	[74, 99]	83	[70, 74]	78	74
6	11	[9, 14]	78	[68, 85]	82	[70, 93]	67	70
12	21	[18, 25]	77	[64, 92]	71	[55, 88]	56	50
24	37	[35, 39]	59	[39, 81]	56	[45, 73]	22	19
25								
30								
32	57	[52, 61]	74	[54, 100]	80	[63, 95]	17	23
33	61	[54, 68]	87	[77, 96]	72	[65, 78]	27	11
				Harris County Area				
2	18	[14, 22]	79	[64, 98]	63	[42, 84]	61	45
7	68	[64, 72]	77	[58, 97]	53	[39, 70]	9	-15
8	7	[5, 8]	71	[53, 88]	77	[56, 91]	64	70
9								
14	10	[8, 12]	88	[82, 92]	79	[69, 86]	77	68
18	58	[49, 64]	93	[86, 99]	55	[40, 67]	34	-4
22	21	[17, 25]	83	[74, 91]	36	[27, 45]	62	15
29	58	[38, 75]	85	[69, 100]	64	[57, 68]	27	6
36	11	[9, 14]	80	[71, 91]	75	[60, 87]	69	64
38	32	[28, 35]	60	[41, 80]	46	[34, 62]	29	14

Notes: Ecological Inference (EI) results estimated using the EI package in R. Precinct demographics used in EI were constructed as described in the text using the 2019-2023 ACS data. The "[min,max]" columns report the EI estimate Confidence Intervals (CIs) of each racial group's Democratic support. Elections used in the analysis are all elections for US President, US Senate, US House, Governor, Lt. Governor, Attorney General, State Supreme Court, Court of Criminal Appeals, Agricultural Commissioner, Comptroller, Land Commissioner, and Railroad Commissioner, for 2016, 2018, 2020, 2022, and 2024.

Table 4. Enacted Map: Ecological Inference (EI) Estimates of Preferences of White, Black and Hispanic Voters in the 2016 to 2024 General Elections in the State of Texas							
	Percent Democratic						
						Polarization	
District	White	[min, max]	Black	[min, max]	Hispanic	[min, max]	B-W H-W
	Dallas – Fort Worth Area						
5	11	[8, 16]	87	[42, 91]	86	[51, 92]	76 76
6	13	[9, 17]	81	[76, 87]	84	[76, 89]	69 72
12	24	[13, 32]	82	[75, 88]	75	[52, 83]	58 51
24	32	[18, 41]	63	[49, 81]	68	[54, 82]	31 36
25	14	[9, 18]	90	[86, 93]	78	[72, 86]	76 64
30	56	[39, 68]	95	[70, 97]	76	[60, 87]	39 20
32	55	[42,63]	78	[67, 92]	83	[71, 89]	23 28
33	56	[42, 63]	92	[87, 94]	84	[67, 91]	36 29
	Harris County Area						
2	20	[7, 26]	83	[61, 89]	63	[49, 87]	63 43
7	58	[42, 69]	74	[64, 85]	70	[50, 88]	17 12
8	10	[7, 22]	77	[62, 86]	80	[67, 89]	67 70
9	53	[42, 64]	95	[90, 97]	76	[62, 86]	42 23
14	13	[10, 16]	92	[91, 93]	79	[75, 83]	79 66
18	54	[38, 67]	95	[92, 97]	69	[47, 85]	41 15
22	18	[10, 28]	83	[77, 88]	53	[37, 74]	64 34
29	45	[28, 64]	86	[82, 90]	77	[54, 92]	42 32
36	12	[10, 19]	84	[81, 89]	77	[61, 85]	72 65
38	25	[13, 35]	64	[50, 80]	61	[36, 81]	39 36

Notes: Ecological Inference (EI) results estimated using the EI package in R. Precinct demographics used in EI were constructed as described in the text using the 2019-2023 ACS data. The "[min,max]" columns report the EI estimate Confidence Intervals (CIs) of each racial group's Democratic support. Elections used in the analysis are all elections for US President, US Senate, US House, Governor, Lt. Governor, Attorney General, State Supreme Court, Court of Criminal Appeals, Agricultural Commissioner, Comptroller, Land Commissioner, and Railroad Commissioner, for 2016, 2018, 2020, 2022, and 2024.

Table 5. Demonstration Map: Ecological Inference (EI) Estimates of Preferences of White, Black and Hispanic Voters in the 2016 to 2024 General Elections in the State of Texas

District	White	[min, max]	Black	[min, max]	Hispanic	[min, max]	Polarization B-W	H-W
				Percent Democratic				
				Dallas – Fort Worth Area				
5	10	[8, 13]	77	[49, 84]	78	[70, 85]	66	68
6	19	[15, 23]	82	[75, 87]	70	[58, 79]	63	51
12	43	[34, 51]	89	[76, 92]	89	[84, 93]	45	46
24	29	[21, 38]	73	[60, 80]	83	[74, 88]	44	54
25	12	[8, 17]	72	[60, 80]	80	[71, 85]	60	68
30	50	[38, 60]	95	[81, 97]	79	[75, 85]	45	29
32	51	[40, 65]	71	[58, 86]	77	[66, 84]	20	26
33	39	[28, 46]	92	[89, 94]	80	[75, 83]	53	41
				Harris County Area				
2	26	[17, 40]	69	[55, 81]	74	[56, 86]	42	48
7	56	[41, 66]	80	[70, 89]	72	[52, 86]	24	16
8	17	[7, 25]	74	[55, 83]	59	[39, 79]	57	42
9	41	[32, 50]	95	[62, 97]	79	[67, 86]	54	38
14	18	[13, 24]	92	[89, 94]	76	[66, 82]	73	57
18	43	[30, 53]	96	[95, 97]	83	[73, 87]	53	40
22	14	[7, 20]	85	[81, 89]	61	[45, 77]	71	47
29	30	[17, 45]	86	[82, 88]	87	[76, 91]	56	57
36	10	[8, 13]	78	[74, 84]	70	[62, 78]	68	60
38	15	[8, 24]	86	[79, 91]	83	[73, 91]	71	68

Notes: Ecological Inference (EI) results estimated using the EI package in R. Precinct demographics used in EI were constructed as described in the text using the 2019-2023 ACS data. The "[min,max]" columns report the EI estimate Confidence Intervals (CIs) of each racial group's Democratic support. Elections used in the analysis are all elections for US President, US Senate, US House, Governor, Lt. Governor, Attorney General, State Supreme Court, Court of Criminal Appeals, Agricultural Commissioner, Comptroller, Land Commissioner, and Railroad Commissioner, for 2016, 2018, 2020, 2022, and 2024.

	Enacted Map			Demonstration Map		
		Hispanic Preferred Candidate			Hispanic Preferred Candidate	
District	Average Vote Percent	Win	Loss	Average Vote Percent	Win	Loss
Dallas – Fort Worth Area						
5	38	0	52	31	0	52
6	35	0	52	30	0	52
12	38	0	52	69	52	0
24	38	0	52	43	0	52
25	31	0	52	27	0	52
30	77	52	0	77	52	0
32	62	52	0	57	49	3
33	74	52	0	62	52	0
Harris County Area						
2	35	0	52	41	0	52
7	61	52	0	61	52	0
8	34	0	52	31	0	52
9	76	52	0	68	52	0
14	33	0	52	38	0	52
18	73	52	0	71	52	0
22	38	0	52	36	0	52
29	69	52	0	66	52	0
36	33	0	52	20	0	52
38	36	0	52	55	44	8

Table 6. Election Outcomes Under Enacted and Demonstration Map, 2016 to 2024 General Elections in the State of Texas,

Notes: Ecological Inference (EI) results estimated using the EI package in R. Precinct demographics used in EI were constructed as described in the text using the 2019-2023 ACS data. The "[min,max]" columns report the EI estimate Confidence Intervals (CIs) of each racial group's Democratic support. Elections used in the analysis are all elections for US President, US Senate, US House, Governor, Lt. Governor, Attorney General, State Supreme Court, Court of Criminal Appeals, Agricultural Commissioner, Comptroller, Land Commissioner, and Railroad Commissioner, for 2016, 2018, 2020, 2022, and 2024.

I declare that the forgoing is correct and true.

Stephen Ansolabehere

March 31, 2025